



Archdiocese of Los Angeles

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March 1, 2010

VIA ELECTRONIC FILING

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Comments of The Archdiocese of Los Angeles
Further Notice of Proposed Rulemaking
WT Docket Nos. 08-166, 08-167; ET Docket No. 10-24**

Dear Chairman Genachowski:

The Archdiocese of Los Angeles ("Archdiocese") urges the Federal Communications Commission ("Commission") to expand eligibility for licensed wireless microphone and other low power auxiliary stations to include religious and educational entities such as the Archdiocese and its affiliates.

The Archdiocese, which covers the nearly 8500 square miles in Santa Barbara, Ventura and Los Angeles counties, serves approximately five million Catholics representing dozens of ethnic and national traditions as well as many others who use its facilities and services. The Archdiocese relies on the use of wireless microphones at most of its 600 separate locations, including parishes, schools, cemeteries and other service units to deliver religious and educational services that are crucial to the Archdiocese's community.

The Commission queries whether some entities are similarly positioned to other heavy microphone users that are currently eligible for licenses. The Archdiocese submits that it is such an entity. The Archdiocese's facilities have multiple classrooms, house a great number of people at one time and are often structurally large. The ability to deliver clear audio signals throughout these types of facilities is crucial. The Archdiocese requires greater reliability and the benefits of interference protection than unlicensed wireless microphone use provides.

For example, the recently constructed Cathedral of Our Lady of the Angels seats over 3,000 worshippers, and employs dozens of wireless microphones that transmit through speakers hidden in brass trumpet-style lighting fixtures strategically positioned

throughout the building. This audio system enables the worshippers in even the most remote pews to enjoy the same experience as those in the front row and to assure clear communications so that those with particular needs such as hearing impaired and non-native English speakers can focus on the content without the hindrance of unclear transmission. It also allows speakers, singers and other participants to move freely over a large area without the distractions or dangers presented by wired microphones.

The Archdiocese is concerned that its sophisticated audio networks could become unusable from a practical standpoint without interference protection. Priests and teachers cannot fulfill their missions if they cannot be heard clearly throughout their churches and classrooms. Students participating in theatrical, musical and other presentations and performances require the support from wireless microphones. Given the importance of wireless microphones to the Archdiocese and its services, we urge the Commission to expand eligibility for licenses to include entities such as the Archdiocese and its educational and religious affiliates.

Sincerely,



David G. Moore
Director of Telecommunications

Cc. Cardinal Roger M. Mahony, Archbishop of Los Angeles
Monsignor Royale M. Vadakin, Vicar General
Monsignor Kevin Kostelnik, Pastor Cathedral of Our Lady of the Angels